



department of water, air and waste management

March 21, 1984

RECEIVED

MAR 23 8 18 AM '84

Mr. Jim Lindsay, Works Manager  
Eagle Signal  
736 Federal St.  
Davenport, IA 52803

DEPARTMENT OF  
WATER, AIR AND  
WASTE MANAGEMENT

Dear Mr. Lindsay:

Attached are results from a hazardous waste inspection conducted at your facility on February 29, 1984 by Mr. Steve Hoambrecker, with this office.

Please note and correct the deficiencies observed in your storage area by May 1, 1984.

Based on your current generation rate of 272 kg/month, you would qualify for "small generator exemption status" (less than 1000 kg/month) if wastes were removed prior to 90 days storage. You may also accumulate up to 1000 kg before period begins.

Regarding desired hazardous waste classification, please respond to Mr. Rod Vlieger (Department of Water, Air and Waste Management, Henry A. Wallace Building, 900 E. Grand, Des Moines, IA 50319, Telephone number 515/281-4076) also by May 1, 1984, with copy of your correspondence to the Iowa Department of Water, Air and Waste Management Regional office.

Mr. Hoambrecker will conduct a followup compliance inspection at this time.

Thank you for your attention and cooperation.

Sincerely,

FIELD SERVICES DIVISION

Merritt W. Van Lier  
Regional Administrator  
Regional Office #6

MWV:w

Enc.

xc: ✓ Rod Vlieger, Central Office  
Donald Sandifer, EPA, Kansas City, MO  
File



R00307808  
RCRA RECORDS CENTER

Regional Office #6 - 117 N. 2nd Ave., P.O. Box 27, Washington, Iowa 52353 - 319/653-2135

# IOWA DEPARTMENT OF WATER, AIR AND WASTE MANAGEMENT

## Report Of Investigation

Page 1 Of 2

<p style="text-align: center;"><b>INVESTIGATION DATE</b></p> <p>Current <u>2/29/84</u>   Last <u>4/9/82</u></p> <hr/> <p><b>TO: (Facility Name, Location &amp; Address)</b></p> <p>Eagle Signal 736 Federal Street Davenport, IA 52803</p> <p>Attn: Jim Lindsay, Works Manager</p> <hr/> <p><b>RE: (Specify Investigation Purpose Or Cite Rule)</b></p> <p>Status Update Facility No. IAD051001337</p>	<p><b>FROM:</b> (Use Stamp)</p> <p style="text-align: center;">Region No. 6 P. O. Box 27 Washington, Iowa 52353</p> <hr/> <p><b>Persons Contacted (Name &amp; Position)</b></p> <p>Arlee D. Tripaldi, Maintenance Supervisor</p> <hr/> <p>Richard Erikson, Manufacturing Service Mgr.</p> <hr/> <p>Bob Tanghe, Manufacturing Engineer</p>
--	---

### OBSERVATIONS/RECOMMENDATIONS

This inspection follows a 4/9/82 inspection to update status concerning hazardous waste rules and regulations. The last inspection stated that Eagle Signal had applied for small generator exclusion status; however, in fact they have not applied.

This inspection did not evaluate this facility but only update status. A hazardous waste management plan has been developed but was not reviewed as a part of this inspection. Only observations regarding the container storage area were made.

It was explained that Eagle Signal is working with ESG Watts, Inc. to dispose of material in storage. A copy of a recently submitted Biennial Hazardous Waste Report was obtained detailing material in storage. This material has accumulated since May 1981 when 31,244 pounds of hazardous waste were manifested off-site. The only waste not generated presently on that list is #9 acid etching. This will not be generated because this facility is not etching circuit boards anymore.

Review of data submitted discovered that quantities estimated for each waste was in error. Each barrel was estimated as 109 kg, however, using the weight of water, each barrel would weigh about 208 kg. The numbers on the report received this inspection were changed. A revised copy should be submitted. A new set of forms will be sent out from Des Moines.

With revised quantities, this facility generated 8982 kg since May, 1981 which for a 33 month period resulted in an average rate generated of 272 kg per month.

Regarding storage area, the following observations were made:

- 1) The container storage area is located in a portion of a parking lot behind the manufacturing facilities. Approximately 40 barrels were in storage with six 20 gal. plastic waste acid carboys also in storage.
- 2) Containers were in adequate condition, stains of a past leak were observed, however.

SUSPENSE DATE	Signature	Date
<u>1/1</u>	Inspector Steve Hoambrecker <i>Steve Hoambrecker</i>	3/14/84
	Regional Administrator Merritt W. Van Lier <i>Merritt W. Van Lier</i>	3/20/84
Enclosures (Specify)		
Distribution: Regional Office: Central Office: Inspected Facility		

REPORT OF INVESTIGATION

RECEIVED  
MAR 23 8 20 AM '84

Page 2 of 2

EAGLE SIGNAL

IAD051001337

- DEPARTMENT OF  
WATER AND  
ENERGY
- 3) Containers were closed. Plastic protection lids were secured on the tops of some of the drums.
  - 4) No inspection procedures were being utilized. Containers should be inspected at least weekly. A check list signing off on inspection should also be developed.
  - 5) Containers with ignitable waste were present and placed adjacent to neighboring building. Ignitable wastes must be maintained at least 15 meters (approximately 50 ft.) from property boundary.
  - 6) Security was questionable, containers were in a fenced area; however, no warning signs were observed. Access was restricted but not totally controlled.
  - 7) Regarding containment, although not required, containers were stored on a relatively steep grade draining toward the city street and associated storm sewer.
  - 8) There was minimal marking on the barrels. It is recommended that hazardous waste stickers be placed on barrels with at least accumulation date, waste classification and identification indicated.

In summary, regarding the container storage area, the above mentioned deficiencies would need to be corrected should this facility remain a storage facility, storing 1000 kg greater than 90 days. A closure plan for the facility was obtained. A copy is attached to the Department's copy of this report.

Since this facility's status has remained in limbo for an extended period of time, it is recommended that a commitment must be made one way or the other regarding status this facility intends to be. It is further recommended that this decision be made no later than May 1, 1984.

If wastes are removed and small generator exclusion status is to be maintained, the closure plan should be implemented. If this facility remains in the system, applicable regulations should be met.

Following receipt of decision, a follow-up inspection will be conducted to determine compliance.

\*per J. Humeston, DEQ Central Office, 4/15/82

SH:w



CLOSURE PLAN FOR HAZARDOUS WASTE STORAGE

AT

EAGLE SIGNAL INDUSTRIAL CONTROLS

736 FEDERAL STREET

DAVENPORT, IOWA 52803

1. This facility would only be closed in the event Eagle Signal should decide to cease operations at this location.
2. Operational supplies are controlled through traveling requisitions and an MRP system. The maximum amount of supplies on hand is three months with an average of thirty to forty-five days. The maximum amount of waste stored here at any given time will never exceed twenty-three fifty-five gallon drums (less than a trailer load). Quantity on hand will range from zero the first week in November to maximum of twenty-three, when we would ship to a disposal site the next April or before. Hazardous waste plus in process material should not exceed forty fifty-five gallon drums (less than a trailer load).
3. As of March 1, 1980, the cost to pick up and dispose of one fifty-five gallon drum of waste was quoted at \$41.00.

Maximum cost of closure would be as follows:

(a) Hauling of accumulated waste:	23 x \$41.00	= \$ 943.00
(b) Clean-up and putting hazardous waste in 55 gallon drums	200 hrs at \$9.10 per hr.	= \$1,820.00
(c) Hauling of clean-up waste	17 drums x \$41.00	= \$ 697.00
Total Cost Of Closure		= \$3,460.00

RECEIVED  
MAR 23 8 21 AM '84  
DEPARTMENT OF  
ENVIRONMENT